

## **EXHIBIT B**

County of Albany )  
 ) ss  
State of Wyoming )

AFFIDAVIT KAY A. PERSICHITTE

I, KAY A. PERSICHITTE being of the age of majority and duly sworn, do upon my oath, depose and state as follows:

1. I am an employee of the University of Wyoming, in the position of Dean of the College of Education.
2. On Sunday, March 28, 2010, I was in Albertson's grocery store in Laramie, Wyoming when I was approached by a man in his fifties or sixties, who I did not know and do not recall ever meeting.
3. The man stated: "You are part of the College of Education, aren't you."
4. I replied "Yes."
5. The man stated: You should all be strung up and he (Ayers) should bomb you."
6. The man then walked off.
7. I was stunned.
8. I did not report this.
9. In later conversations with Dr. Myron Allen, Provost, and Dr. Francisco Rios, probably on Monday, March 29, I mentioned that things were escalating and getting ugly.
10. I e-mailed Provost Allen, and Don Richards, on March 29, 2010 at 12:15 PM: "Just got off the phone with Chuck Brown...I urged him to contact Myron and/or Tom with the information he shared with me. He was under the impression that the Ayers invitation had come from the College of Education. He has reason to believe that this is now a national story that holds the UW College of Education in the limelight. I have received multiple threats and they extend well beyond financial. My office staff and dept heads are referring calls as requested. I'll wait to hear from you."
11. I talked to Dr. Rios two to three times on Sunday, March 28, 2010.
12. At some point he said he was getting threats.
13. I received numerous e-mails and calls concerned about what the College of Education was doing, and threatening harm to future funding as well as threatening not to send their children to the College of Education.
14. It is my belief that the threats were escalating in terms of their aggressive nature.



